

EXHIBIT C

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
4 AT CHARLESTON
5
6

7 JO HUSKEY AND ALLEN HUSKEY, :
8 Plaintiffs, : CASE NUMBER
9 v. : 2:12-cv-05201
10 ETHICON, INC., ET AL., :
11 Defendants. :
12

13
14 TRANSCRIPT OF TRIAL - DAY TWO

15 AUGUST 25, 2014

16 BEFORE THE HONORABLE **JOSEPH R. GOODWIN**,
17 UNITED STATES DISTRICT JUDGE

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19
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25 Proceedings recorded by machine stenography; transcript
produced by computer.

—GUELCHER — CROSS — THOMAS —

1 A. Prolene is a brand name, it's essentially polypropylene
2 with antioxidants and lubricants.

3 Q. And Ethicon first used Prolene in its sutures?

4 A. That's my understanding.

5 Q. And sutures are what we in West Virginia call stitches,
6 right?

7 A. Call them that in Virginia, too, where I grew up.

8 Q. Down in Blacksburg?

9 A. Yes, sir.

10 Q. And so Ethicon Prolene stitches or sutures have been
11 around since the late Sixties?

12 A. That's my understanding, they've been around since the
13 Sixties.

14 Q. And what makes Prolene Prolene as opposed to simple
15 polypropylene are the additives that you talked about,
16 correct?

17 A. Yes. The brand name Prolene is defined by the additives
18 that are added to the polypropylene.

19 Q. And those additives are calcium stearate, do you remember
20 that?

21 A. Calcium stearate is added as a lubricant.

22 Q. And DLTDP because I can't pronounce the full word.

23 A. It's a long word. It's an antioxidant.

24 Q. Santonox R?

25 A. Another antioxidant.

GUELCHER - CROSS - THOMAS

1 Q. Procol LA-10?

2 A. I think that's another surfactant.

3 Q. And a CPC --

4 THE COURT: That's another what? I didn't hear it.

5 THE WITNESS: I'm sorry. It's another surfactant or
6 a lubricant.

7 THE COURT: All right.

8 BY MR. THOMAS:

9 Q. And then the coloring, the CPC pigment, correct?

10 A. Yes, sir.

11 Q. And those additives are what make Prolene different from
12 the other polypropylene medical devices on the market,
13 correct?

14 A. There are many different grades of polypropylene; Marlex,
15 Prolene, different grades --

16 THE COURT: Is that a yes or a no?

17 THE WITNESS: I'm sorry. Yes.

18 MR. THOMAS: Thank you.

19 BY MR. THOMAS:

20 Q. Now, Ethicon Prolene sutures are what is known as
21 non-absorbable sutures, correct?

22 A. They're marketed as non-absorbable.

23 Q. Okay. And what that means is they are supposed to be in
24 the body for life?

25 A. They're supposed to be without changing, yes.

